## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO

IN RE:	)	MDL Docket No. 1953
HEPARIN PRODUCTS	)	CHIEF JUDGE JAMES G. CARR
LIABILITY LITIGATION	j	CASE NO. 1:08-hc-60000
	)	
	)	ALL CASES

## PLAINTIFFS' EXECUTIVE COMMITTEE'S MOTION REQUESTING AN ORDER SETTING GUIDELINES FOR THE ATTORNEY-CLIENT PRIVILEGE AND WORK PRODUCT DOCTRINE

The Plaintiffs' Executive Committee ("PEC") moves for an order setting guidelines for the attorney-client privilege and work product doctrine. In support of this motion, the PEC incorporates the attached memorandum of law.

Respectfully submitted,

/s/ David W. Zoll

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## Plaintiffs' Executive Committee

**CERTIFICATE OF SERVICE** 

I hereby certify that on this 10th day of July, 2009, a copy of the

foregoing was electronically filed. Notice of this filing will be sent to all parties

by operation of the Court's electronic filing system, and parties may access this

filing through that system.

/s/ David W. Zoll

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